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April 6, 2011 (PBW Project No. 1352)

VIA FEDERAL EXPRESS

Mr. Gary Miller Remedial Project Manager U.S. Environmental Protection Agency, Region 6 Superfund Division (6SF-RA) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Ms. Barbara Nann Assistant Regional Counsel U.S. Environmental Protection Agency, Region 6 Superfund Division (6RC-S) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

RE: FINAL REMEDIAL INVESTIGATION REPORT
GULFCO MARINE MAINTENANCE SUPERFUND SITE
FREEPORT, TEXAS

Dear Mr. Miller and Ms. Nann:

Please find enclosed four (4) copies (Mr. Miller) and one copy (Ms. Nann) of the Final Remedial Investigation (RI) Report for the Gulfco Marine Maintenance Superfund Site (the Site). This report was prepared by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy), and The Dow Chemical Company (Dow). An electronic copy of the entire report in Adobe® format is provided on the DVD transmitted to Mr. Miller herewith. In accordance with Paragraph 52 of the amended Unilateral Administrative Order for the Site, effective January 31, 2008 (the amended UAO), I certify that I have been fully authorized by the above Respondents to submit this report and to legally bind these Respondents thereto. As you know, Parker Drilling Offshore Corporation is participating in the Site work, as well, under an agreement it reached with the Respondents.

This Final RI Report incorporates EPA's comments on the Draft RI Report dated February 4, 2011 as provided in a March 7, 2011 letter from Mr. Miller. Those comments and our responses indicating how the comments have been incorporated into this Final RI Report are attached to this letter. A redline-strikeout showing the text changes between the draft and final reports is also attached for your reference.

Mr. Miller and Ms. Nann April 6, 2011 Page 2

Please provide your approval of this final report at your earliest convenience. Should you have any questions, please do not hesitate to contact me at any time.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

Eric F. Pastor, P.E. Principal Engineer

Enclosures

cc: Ms. Luda Voskov – Texas Commission on Environmental Quality (2 copies)

Mr. Doug McReynolds – EA Engineering, Science and Technology

Mr. Ron Brinkley - US Fish and Wildlife Service

Mr. Don Pitts - Texas Parks and Wildlife Department

Mr. Andy Tirpak - Texas Parks and Wildlife Department

Mr. Tommy Mobley - Texas General Land Office

Mr. Larry Champagne - Texas Commission on Environmental Quality